

March 2008,

The Honorable Chairman Kevin J. Martin
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Dear Chairman Martin,

This correspondence is in regards to the recent proposal regarding the Notice Of Proposed Rulemaking that would re-regulate broadcast stations. Having been involved in the industry for over 16 years, I believe this proposal is ill-advised as it's based on a blanket misconception that local broadcasters do not adequately support their communities. I, and those I've worked with, have always taken tremendous pride in providing not just entertainment value, but dedicated community service as well. The elements in this proposal would not only result in less crucial jobs for our stations, but would create a product that our community would not listen to.

Radio has been declared 'dead' several times over the years, but it always survives. From the advent of television to the introduction of satellite radio, our industry has been told by 'experts' that such new technologies would be our demise. We survive and thrive because not only do we provide an entertaining and informative product, but we program our product to super serve the communities in which we live. Our radio stations provide a forum for local talk shows, local college and high school sporting events, and countless community events. We encourage our listeners to notify us of a charity or community function so that we may share it with others, including putting such local information on our websites. On radio stations that are music-based, we use data from our listeners to help us determine what songs they want to hear and what other elements they want on our radio station. That data, along with other feedback we obtain from our listeners, is a major factor in programming each station to suit its listener base.

Potentially handing down such a proposal would hurt us in many ways. First, it would cause us to allocate our limited resources to areas that are best served by using the technology afforded to us, such as overnight remote operation and spot voice tracking. This would cause a loss of crucial jobs, those producing local daytime programming for example. Second, requiring quantitative programming guidelines would homogenize radio in communities. I firmly believe this would adversely affect the amount of listeners to radio, leading further reduction of broadcasting jobs and audience erosion. Thirdly, the community advisory boards you suggest would not create better radio for a community. It would get buried in politics and

posturing by people who make up an insignificant portion of a listening audience, if they even listen to the radio stations they would be impacting at all.

These proposals are an insult to those of us who spend our days thinking of ways to create the best possible products for those in our community. It would not help the sound of our radio stations; it would only hurt our stations, our staff and the entire community. This is a day and age where listeners go online and in two seconds travel the world. They can turn on one of hundreds of satellite radio stations, or their personal device, and hear music, news, sports, weather, traffic conditions, and the list goes on and on. The only people who think that these proposals would help better serve local radio are those who do not live in the type of community they are trying to help. Are you living in our community? Do you speak with our community members? We just had a blizzard hit our area today and a half dozen employees slept overnight in our facility, including a broadcaster who brought her children here to sleep on the floor. They made this commitment to guarantee they would be able to be on the air for our community, broadcasting closings, warnings, and having listeners be able to call and share their stories. Were you here?

I strongly urge you not to move forward with these potential new rules as the end result will be the exact opposite of your goals. We live and breathe in this community and we walk side by side with others who live in it. We are 100% dedicated to creating a product that serves this community in which we live, on multiple levels, and we are not alone. I implore you to travel this great land of ours and you will find countless other local broadcasters with the dedication we have. Do not take this away from us and the others who share a passion for broadcasting and localism.

Sincerely,

David Drew
Operations Manager
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